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struck by wheel of truck, detached from truck because of the force of the impact when wheel of truck dropped suddenly and with great force into the rut.

[Ed. Note.—For other cases, see 10 Va.-W. Va. Enc. Dig. 374.]

Error to Circuit Court of City of Norfolk.

Action by Queenie Tripp against the City of Norfolk. Demurrer to declaration sustained, and plaintiff brings error. Reversed and remanded.

*H. C. Nicholas* and *L. S. Parsons*, both of Norfolk, for plaintiff in error.

*R. W. Peatross*, of Norfolk, for defendant in error.

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BIBBS *v.* COMMONWEALTH.

March 17, 1921.

[106 S. E. 363.]

**1. Infants (§ 20\*)—In Prosecution for Causing Girl to Commit Fornication, Held Not Error to Exclude Evidence to Prove Her Bad General Reputation.**—In a prosecution, under Acts 1914, c. 228, for causing and encouraging a girl under 18 to commit fornication with accused, there was no error in refusing to permit accused to introduce evidence to prove her bad general reputation for chastity.

[Ed. Note.—For other cases, see 5 Va.-W. Va. Enc. Dig. 313.]

**2. Infants (§ 20\*)—It Is an Offense to Encourage a Child to Commit a Misdemeanor, and Participation in Fornication with Her Makes Accused Guilty.**—It is not essential to an offense, under Acts 1914, c. 228, making it a misdemeanor for a person over 18 to "cause or encourage" a child under that age to commit a misdemeanor, that accused should have "caused" prosecutrix to commit the misdemeanor, and he is guilty if he encouraged her to do so, and participating in fornication with her encourages her, and makes him guilty, though she may have made the first advance.

[Ed. Note.—For other cases, see 2 Va.-W. Va. Enc. Dig. 142.]

*Will A. Cook*, of Madison, and *Geo. L. Browning*, of Orange, for plaintiff in error.

*John R. Saunders*, *Atty. Gen.*, and *J. D. Hank, Jr.*, *Asst. Atty. Gen.*, for the Commonwealth.

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TUCKER SANATORIUM, Inc., *v.* COHEN.

March 17, 1921.

[106 S. E. 355.]

**1. Negligence (§ 108 (1)\*)—Requisites of Declaration Stated.**—A declaration in a negligence case should contain sufficient allegations

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\*For other cases see same topic and KEY-NUMBER in all Key-Numbered Digests and Indexes.